

FAA - 2002 - 11580 - 7



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • FAX (301) 695-2375
www.aopa.org

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February 28, 2002

Docket Management System
FAA-2002-11580
US Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590

DEPT. OF TRANSPORTATION
DOCKET
02 MAR - 1 AM 11:00

Re: Docket Number FAA-2002-11580, Enhanced Security Procedures for Operations at Certain Airports in the Washington, DC Metropolitan Area Special Flight Rules Area (SFAR-94)

The Aircraft Owners and Pilots Association (AOPA), representing the interests of over 380,000 general aviation pilots, submits the following comments to Special Flight Rules Area (SFAR) 94; Enhanced Security Procedures for Operations at Certain Airports in the Washington, DC Metropolitan Area. Overall, AOPA is pleased with the rule and subsequent restoration of based operations at College Park Airport, Hyde Field, and Potomac Airfield, all of which remained closed since September 11, 2001. However, there is one issue in the SFAR that needs further clarification and it relates to the VFR corridor between Washington and Baltimore.

As currently defined, the northeast boundary of SFAR-94 creates an unintentional airspace trap for general aviation pilots using the VFR corridor between Washington and Baltimore. In the Definition Section of SFAR-94, the FAA clearly states that, "SFAR-94...excludes the VFR corridor between Washington and Baltimore." However, when the lat/long coordinates given in the rule are plotted, they create a restricted airspace boundary that cuts directly through the charted VFR waypoint for the western entrance point of the VFR corridor. This discrepancy could result in pilots unknowingly violating the SFAR airspace and being subject to military interception and enforcement action.

To fix this problem, AOPA recommends the FAA correct the geographic coordinates of the SFAR airspace, to align them with the southern boundary of the VFR corridor. This change would be minor, would not alter the intent of the rule, and would not compromise security of the significant government assets in Washington.

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While AOPA is pleased to note that many of its recommendations regarding security procedures were incorporated into the SFAR, we believe that fixing the corridor boundary problem would completely resolve the one remaining general aviation concern that AOPA has regarding this airspace.

Finally, we applaud the FAA's diligence in implementing procedures that place the least amount of financial and operational hardship on users. As noted in the final rule, security options including the employment of full-time law enforcement personnel at the airports, a requirement for aircraft to land at gateway airports for inspection, and other burdensome procedures were rejected in favor of common sense ideas that take advantage of existing airport resources.

It is AOPA's desire to see SFAR-94 expanded in the future with the goal of restoring all general aviation operations at these airports.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melissa K. Bailey', with a long horizontal line extending to the right.

Melissa K. Bailey
Vice President
Air Traffic Services

Cc:
Steve Brown
Bill Peacock